

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CASSANDRA SHIH,

Plaintiff,

Case No. 18-CV 5495(JFK)(BCM)

-against-

PETAL CARD, INC., f/k/a CREDITBRIDGE,
INC., ANDREW ENDICOTT, and JASON
GROSS,

Defendants.

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DECLARATION OF CASSANDRA SHIH

I, Cassandra Shih, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am the Plaintiff in the above-captioned action and have personal knowledge of the facts set forth herein.

2. I understand from my counsel that Defendants' most recent letter-motion seeking discovery concerning my ongoing businesses, employment, and business partners relies upon statements I made concerning my online travel company, Tripsha. In particular, Defendants point to interviews and presentations that I have given as recently as June of 2021, and as far back as September of 2019 (Defs. Letter Motion, Dkt. 204 at pp. 2-3). Media interviews and presentations are part of routine promotional and fundraising efforts, and are necessary to further growth. Neither Tripsha, nor these interviews or presentations, have anything to do with this litigation or any of the Defendants.

3. Defendants also point to a July 13, 2018 exchange I had with Elyse Lee (Dkt. 204-8) about her ideas for a possible media plan for the case. I had met Elyse earlier in 2018 while traveling, we became friends, and I understood her to have a background in media

relations. Immediately after the Kaplan Hecker firm appeared as counsel for Defendants in this case on July 11, 2018 (Dkt. Nos. 31-33), and due in large part to the firm's well-known public profile as media savvy attorneys, I briefly considered whether I might need a media strategy for this lawsuit and discussed the matter with Elyse. Elyse gave me her thoughts and made recommendations, but I did not proceed with any of them. I did not hire her to implement any plan, and did not otherwise engage with her about the case or implement any media strategy for the case.

4. The media interviews and presentations that I have given to promote Tripsha and further its fundraising efforts have nothing to do with this case or Elyse Lee.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on the 13th day of September, 2021.



Cassandra Shih